



## FRAUD DETECTION BY THE NUMBERS – Code Unbundling, Upcoding, Modifying, and Trends

- I. **CPT Codes – An Overview**
  - a. What are CPT codes?
  - b. Origin of CPT Codes
  
- II. **Unbundling**
  - a. Definitions
  - b. Unbundling problematic only with specifically defined codes calling for multiple procedures
  
- III. **Implications of Unbundling – Costly Mistakes or Decisions:**
  - a. Cases involving hospitals and providers being fined for unbundling
  
- IV. **Advantages to Providers**
  - a. \$\$\$
  - b. Intent Required?
  
- V. **Difficulties in Detection**
  - a. Requires acute understanding of coding
  - b. Complex computerized billing analysis software maximizes detection
  - c. Without understanding of complex medical procedures, unbundling remains undetected
  
- VI. **Correct Coding Initiative**
  - a. Definitions
  - b. What NCCI stated
  - c. Impact under NCCI
  - d. Penalties per NCCI
  
- VII. **Examples of Unbundling**
  - a. Fragmenting
  - b. Reporting separate codes for related services when one comprehensive code includes all related services.
  - c. Breaking out bilateral procedures when one code is appropriate.

- d. Separating a surgical approach from a major surgical service.

### VIII. Chiropractic Code Games

- a. Definitions:
- b. *E/M*: Evaluation and Management
- c. *CMT*: Chiropractic Manipulative Treatment
- d. Specific Problems:
  - i. #1 It is inappropriate to bill an established office/outpatient E/M CPT code (99211-99215) on the same visit as CMT (CPT 98940-98943) because CMT codes already include a brief pre-manipulation assessment.
    - 1. HOWEVER: E/M Code + CMT Codes MAY be proper if new patient or new injuries or exacerbations or periodic reevaluations
    - 2. Know that billing an E/M code on every visit is improper.
  - ii. #2 Billing an E/M Code in Place of CMT: In cases where a limited number of manipulations are allowed DCs are being advised to use an E/M code instead of a CMT code to get around the limit on CMT. This is inappropriate.
  - iii. #3 Inappropriately Billing CPT 97140 ("manual therapy") in Place of CMT: Billing for multiple time-based codes such as several manual therapies (CPT 97140), when a CMT was the only service performed, is inappropriate. You cannot replace a CMT CPT code with another CPT code if the CMT was the actual service performed.
  - iv. #4 Unbundling: Some providers are requiring a patient to return to the office on the next day to perform a service that would not otherwise be covered, or that may allow higher reimbursement if it is done as a "stand-alone" procedure on a separate day.

### IX. Radiology Unbundling

- a. Diagnostics codes MRI's
  - CPT code Description RV Payment
  - 72158 MRI Spinal Canal Lumbar w/o & w/ contrast material 71.7 \$896.25
  
  - Code 72158 not billed but unbundled as follows.....
  - CPT code Description RV Payment
  - 72148 MRI Spinal Canal Lumbar without contrast material 51.2 \$608.00
  - 72149 MRI Spinal Canal Lumbar with contrast material 60.8 \$722.00
  
- b. Diagnostics codes Cat Scans
  - CPT code Description RV Payment
  - 74170 Cat scan abdomen w/ & w/o contrast material 40.3 \$478.56
  
  - Code 74170 not billed but unbundled as follows.....
  - CPT code Description RV Payment
  - 74150 Cat scan abdomen without contrast material 28.8 \$342.00
  - 74160 Cat scan abdomen with contrast material 33.4 \$396.63

- X. **Upcoding**
  - a. Definition
  - b. Examples
  
- XI. **Code Modifying**
  - a. Definition
  - b. Examples
  - c. Most Common Modifiers as Red Flags
  
- XII. **Texas Law**
  - a. Statutes
  - b. Case law
    - i. Allstate Insurance v. Receivable Finance Company
    - ii. James C. Baxter, D.C, v. Texas Board of Chiropractors Examiners
  
- XIII. **DRX-9000**
  - a. What is it?
  - b. Claims
  - c. Fraudulent Billing Practices
  
- XIV. **Conclusion with Q/A Session**